

Message

From: Greg Schrab [gschrab@sm-energy.com]
Sent: 8/8/2018 5:43:56 PM
To: Lundelius, Diana [Lundelius.Diana@epa.gov]
Subject: RE: NSPS OOOO/OOOOa - Report and Notification Electronic Submission Requirements
Attachments: ATT00001.txt

Diana,

Thanks, this is very helpful! So SM will plan on reporting our TX facilities via pdf reports emailed to the email address you provide below, as well as to the appropriate TCEQ offices. And we'll see how the template and overall reporting part of the rule might change via the reconsideration process as you and Amy say, and how things might change for next year's reporting.

One thing I'd ask, and I know this is not just a Region 6 issue, is could EPA post an update with these clarifications on both the CEDRI and Oil and Gas OOOOa reporting websites, so that all of industry would know what the reporting options are for this year? Also, perhaps a uniform email from the Regions to all operators that reported last year might help as well.

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager

1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: (303) 257-5533
gschrab@sm-energy.com

From: Lundelius, Diana <Lundelius.Diana@epa.gov>
Sent: Tuesday, August 7, 2018 2:07 PM
To: Greg Schrab <gschrab@sm-energy.com>
Subject: RE: NSPS OOOO/OOOOa - Report and Notification Electronic Submission Requirements

WARNING: This email originated from outside of SM Energy. Do not click links or open attachments unless you recognize the sender and are expecting the content and know it is safe.

As it stands now, Amy's reply is good for NSPS OOOOa. Only certain information is reported through CEDRI, and you may use the templates to voluntarily report via CEDRI while the templates are still draft and the rule is still under consideration; or, you can use some other format or template. The activation of the CEDRI portal was done without much notification, so some of the Regions weren't aware it had been activated until some months later, which is why the emails I sent initially were not consistent with the CEDRI web page. You should also send copies of NSPS OOOOa reports to the state(s), whether using the available templates or some other format or template. **Any reports or notifications under NSPS OOOOa for Region 6 states that are not reported through CEDRI should be submitted electronically to R6WellCompletion@epa.gov** until any rule modifications are finalized and the states become delegated. I cannot speak for any other Region except Region 6, because I do not know how each Region is handling

electronic reporting or how they want to receive reports. The templates were developed at EPA HQ, so you will have to ask the CEDRI contact on the web site how to handle reporting multiple facilities using the templates. Hope this clarifies things further for now on where to submit reports and other notifications until the reconsideration moves forward to some sort of resolution.

Diana L Lundelius CHMM
Senior Enforcement Officer
Lean Six Sigma Black Belt
Fellow of the Institute of Hazardous Materials Management
USEPA Region 6
Compliance Assurance & Enforcement Division
Air Enforcement Branch
Air Permitting Enforcement Section, Mail Code 6EN-AA
1445 Ross Avenue, Suite 1200
Dallas TX 75202-2733
214-665-7468

Lundelius.Diana@epa.gov

"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

From: Greg Schrab [mailto:gschrab@sm-energy.com]

Sent: Tuesday, August 7, 2018 1:40 PM

To: Lundelius, Diana <Lundelius.Diana@epa.gov>

Subject: RE: NSPS OOOO/OOOOa - Report and Notification Electronic Submission Requirements

Importance: High

Diana,

I have talked with a couple of industry peers and consultants, and would like some clarification on if annual OOOOa reporting due Oct.31 MUST be via CDX/CEDRI, or simply MAY be via CDX/CEDRI and reporting via emailed reports as noted in your 11/6/17 email to our Midland, TX office below, is still allowed.

I've attached two emails:

- 1) from you to a consultant in November and January, excerpt below:
The NSPS OOOO/OOOOa report portal is now ACTIVE. This has not been widely announced because of the pending reconsideration on certain parts of NSPS OOOOa. Until the rule changes again as a result of reconsideration, you can submit 60.5422a(a) and (b) reports using the available templates in CEDRI. The link to access CEDRI and the Excel spreadsheet report templates may be found at <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri#list>. There is a lot of data on the page, so scroll down. The active links also lead to other guidance and information. If you have questions about the NSPS OOOOa report template, email Lisa Thompson at EPA HQ through the link on the CEDRI page, or call 919-541-9775.
- 2) from Amy Hambrick/EPA to an industry peer this morning (which he received after clicking on the "contact us" link on the CEDRI webpage), excerpt below:
The reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is

mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense? Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. When EPA proposes amendments to OOOOa and updates the reporting template, the public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments when the opportunity comes round.

Also see the attached email with a few screen shots from the CEDRI and Oil and Gas websites, as well as the CEDRI Update Log linked to the header of the table of rules and required reports available in CEDRI: <https://www3.epa.gov/ttn/chief/CEDRIfiles/CEDRIUpdateLog.pdf>

Now some excerpts from the CEDRI and Oil and Gas websites on OOOOa reporting:

From CEDRI website <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>

Announcements

- [CEDRI Stats](#) updated below (May 11, 2018)
- A draft version of the [§63.655\(h\)\(8\) Fenceline Monitoring Report CEDRI Spreadsheet Template](#) is available for comment. The Fenceline Monitoring Report will be submitted using EPA's [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#) after obtaining 12 months of data. All comments/questions for the spreadsheet template should be submitted to the docket (identified by Docket ID No. EPA -HQ-OAR-2010-0682) using the Federal eRulemaking Portal: <http://www.regulations.gov>.
- Oil and Gas [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#) - spreadsheet template is available on the Oil and Gas rule webpage. CEDRI is available to collect this report electronically. However, facilities are not required to electronically submit the Annual Report until 90 days after the final template is posted in CEDRI. Please [contact us](#) if you have any questions related to the Part 60 OOOOa Annual Report.

From Oil and Gas OOOOa reporting website: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#reportOOOOa>

OOOOa Reporting

October 6, 2017- EPA posts [template spreadsheet](#) for reporting data required by the 2016 New Source Performance Standards. The 2016 standards include several electronic reporting requirements using the agency's [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#). CEDRI can now collect these reports electronically, although the final template is not available. Until the final template is available in CEDRI, facilities may submit the Annual Report through CEDRI, but also must submit the report to the appropriate address(es) listed in 60.4(a) and (b). Note, facilities are not required to electronically submit the Annual Report until 90 days after the final template has been made available in CEDRI. EPA will update this page when final electronic reporting forms are available.

I recall when the template was posted to the CEDRI website last October 6, it was directly on the CEDRI website in the rules and reports table, not via a link to the Oil and Gas site. Also, there was a note that although the template was available, CEDRI was not yet functional, and so annual reporting MUST be via hardcopy to your delegated authority. But now on the CEDRI rules and reports table (see screen shot and attached CEDRI update log at link above), it says that as

of 10/25/17 CEDRI was available using the spreadsheet template, yet with "none" as a note regarding any updates (which wasn't the case, as when the template was initially posted on 10/6/17, CEDRI itself was not yet functional). Also, the current note in the CEDRI update log that CEDRI is available as of 10/25/17 does not match your email below, or the November 14 email in the first attached email string, saying the CEDRI reporting portal was not yet active.

And by reading the paragraphs on the CEDRI and Oil and Gas OOOOa reporting sites, it appears that the template posted 10/6/17 is not final. However, it's not identified as a draft, for example, as on the CEDRI site the fenceline monitoring report spreadsheet is clearly identified as a draft available for public comment. Now moving to public comment, both your January 22 email in the first attachment, and Amy Hambrick's email this morning, discuss the OOOOa reconsideration process, and raise the possibility that the template could also change. However, the template is not actually not part of the rule itself, and it's also not identified as a draft available for public comment on either the CEDRI or Oil and Gas sites.

So given all of this confusing and sometimes conflicting information, my company, and industry in general, needs to know if OOOOa annual reporting due the end of October MUST be electronically via CDX/CEDRI and the annual report spreadsheet template, or if may still be via copy emailed to the EPA Region offices. I'd like the answer for Region 6, which you should be able to answer, but also for all EPA Regions, including EPA Region 8.

I will add that based on some initial review of the CDX/CEDRI manual and the spreadsheet template, it appears as currently configured, electronic reporting will be very onerous, as every individual facility will have to be entered into CEDRI directly, in order to be assigned a facility ID. Then these facility IDs will have to be included when populating the spreadsheet with all of the required information under each section of the rule/tab on the spreadsheet, for actual submission in CEDRI.

Thank you very much for your time.

Respectfully,

Greg Schrab, CHMM, CSP
Corporate EH&S Manager

1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: (303) 257-5533
gschrab@sm-energy.com

From: Lundelius, Diana [<mailto:Lundelius.Diana@epa.gov>]

Sent: Monday, November 6, 2017 1:43 PM

Subject: NSPS OOOO/OOOOa - Report and Notification Electronic Submission Requirements

Hello,

If you receive this email, you have recently submitted a paper copy NSPS OOOO/OOOOa annual report or other notification. EPA Region 6 very much appreciates your timely report or notification submission. In accordance with new Lean Management directives, we are making changes to reduce costs associated with managing and maintaining paper records – both for the regulated community and for EPA. Since the CEDRI reporting portal is not yet active, please be advised that, **effective immediately with your receipt of this email communication, EPA Region 6 will no longer accept paper copy reports,**

notifications, or other correspondence/communication for reporting under NSPS OOOO and OOOOa. Additionally, please do not send compact disks or USB (flash) drives in lieu of paper copies. In the future, please submit all required correspondence electronically by email to R6WellCompletion@epa.gov. (Please do not send reports to my personal EPA email address.)

Use the following instructions to submit your reports and data by email:

1. Acceptable file formats are limited to Adobe pdf files, or, compressed zip files with any combination of Microsoft Word, Excel or Adobe documents. NO OTHER FILE FORMATS will be accepted.
2. Report submissions become public record. NO CONFIDENTIAL BUSINESS INFORMATION (CBI) will be accepted via email.
3. Please be sure that your scanned submissions include a copy of the signature by your responsible official, as appropriate.
4. Photos should be embedded in Word or Adobe documents wherever possible. As an alternative, a large number of photo records may be submitted in jpeg format in a compressed zip file.
5. Pdf or zip file attachments should not exceed 10 MB total. Several email transmissions may be necessary in this regard.
6. In the Subject line of your email, please use the following format: NSPS OOOO/OOOOa-Company Name/Facility Name-State or Tribal Land-Name of Report-Time Period Covered
7. In the body of the email, please include the contact name, company name, mailing address, phone number and email address for the person who can answer technical questions regarding the submission.
8. Because of the volume of reports and notifications received, EPA cannot provide confirmation for each individual report. If a delivery confirmation is desired, please use your email program to exercise the option to receive a Delivery and/or Read receipt for your email submissions.

EPA appreciates your cooperation with this request.

Best regards,

Diana L Lundelius, CHMM

Fellow of the Institute of Hazardous Materials Management (IHMM)

R6 Process Improvement Network – Lean Six Sigma Black Belt

CAA Consent Decree Coordinator

NSPS OOOO/OOOOa Notification & Reporting Tracking Coordinator

Senior Enforcement Officer

USEPA Region 6

Compliance Assurance & Enforcement Division

Air Enforcement Branch

Air Permitting Enforcement Section, Mail Code 6EN-AA

1445 Ross Avenue, Suite 1200

Dallas TX 75202-2733

214-665-7468

Lundelius.Diana@epa.gov

R6WellCompletion@epa.gov